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Attorneys for Defendants
BROADSPIRE SERVICES, INC.
AND PLATINUM EQUITY LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

PHILIP K. CONLEY, an individual,

Plaintiff,

vs.

KEMPER INSURANCE COMPANIES, an
Illinois Corporation; BROADSPIRE
SERVICES, INC., a Delaware
Corporation, aka Broadspire Management
Services; PLATINUM EQUITY LLC,
Delaware Limited Liability Company;
DOES 1-100, inclusive,

Defendants.

CASE NO. C 05-02249 MJJ

**STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING CASE
MANAGEMENT CONFERENCE AND
ASSOCIATED DEADLINES**

Current Date: September 20, 2005 at 2:00 p.m.
Proposed Date: October 18, 2005 at 2:00 p.m.

The Honorable Martin J. Jenkins

1 WHEREAS, the Court has scheduled a Case Management Conference for this
2 matter on September 20, 2005 at 2:00 p.m., and the Court has also set other initial case
3 management deadlines in association with this date;

4 WHEREAS, lead trial counsel for Defendants Broadspire and Platinum Equity will
5 be unable to attend the September 20, 2005 Case Management Conference due to existing and
6 long-standing travel plans;

7 WHEREAS, the Plaintiff's motion to remand the case to state court has been
8 argued and submitted, but the Court has not yet issued an order on that motion;

9 WHEREAS, the parties have met and conferred on the continuance of certain case
10 management deadlines and stipulate to the entry of an order to the following effect through their
11 counsel of record:

12 ///

13 ///

14 ///

IT IS HEREBY STIPULATED that (1) the Case Management Conference currently scheduled for September 20, 2005 at 2:00 p.m. is hereby continued until October 18, 2005 at 2:00 p.m.; (2) the parties shall file a joint Case Management Conference Statement no later than October 7, 2005; (3) the parties shall meet and confer on early settlement and discovery issues prior to October 7, 2005; and (4) the parties shall complete initial disclosures by October 7, 2005 or at such other time as mutually agreed.

Respectfully submitted,

DATED: September __, 2005

LAW OFFICES OF PHYLLIS E. ANDELIN
PHYLLIS E. ANDELIN

By: _____
PHYLLIS E. ANDELIN
Attorneys for Plaintiff
PHILIP K. CONLEY

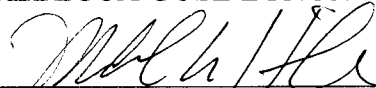
DATED: September __, 2005

MECKLER BULGER & TILSON, LLP
BOORNAZIAN, JENSEN & GARTHE

By: _____
Attorneys for Defendant
KEMPER INSURANCE COMPANIES

DATED: September 8, 2005

MUNGER, TOLLES & OLSON LLP
MALCOLM A. HEINICKE
REBECCA GOSE LYNCH

By:  _____
MALCOLM A. HEINICKE

Attorneys for Defendants
BROADSPIRE SERVICES, INC. AND
PLATINUM EQUITY LLC

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: 9/12/2005


The Honorable Martin J. Jenkins

IT IS HEREBY STIPULATED that (1) the Case Management Conference currently scheduled for September 20, 2005 at 2:00 p.m. is hereby continued until October 18, 2005 at 2:00 p.m.; (2) the parties shall file a joint Case Management Conference Statement no later than October 7, 2005; (3) the parties shall meet and confer on early settlement and discovery issues prior to October 7, 2005; and (4) the parties shall complete initial disclosures by October 7, 2005 or at such other time as mutually agreed.

Respectfully submitted,

DATED: September 8, 2005

LAW OFFICES OF PHYLLIS E. ANDELIN
PHYLLIS E. ANDELIN

By: Phyllis Andelin
PHYLLIS E. ANDELIN
Attorneys for Plaintiff
PHILIP K. CONLEY

DATED: September __, 2005

MECKLER BULGER & TILSON, LLP
BOORNAZIAN, JENSEN & GARTHE

By: _____
Attorneys for Defendant
KEMPER INSURANCE COMPANIES

DATED: September 8, 2005

MUNGER, TOLLES & OLSON LLP
MALCOLM A. HEINICKE
REBECCA GOSE LYNCH

By: Malcolm A. Heinicke
MALCOLM A. HEINICKE

Attorneys for Defendants
BROADSPIRE SERVICES, INC. AND
PLATINUM EQUITY LLC

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: _____

The Honorable Martin J. Jenkins

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Respectfully submitted,

DATED: September __, 2005

LAW OFFICES OF PHYLLIS E. ANDELIN
PHYLLIS E. ANDELIN

By: _____
PHYLLIS E. ANDELIN
Attorneys for Plaintiff
PHILIP K. CONLEY

DATED: September 9, 2005

MECKLER BULGER & TILSON, LLP
BOORNIAZIAN, JENSEN & GARTHE

By: _____
Attorneys for Defendant
KEMPER INSURANCE COMPANIES

DATED: September __, 2005

MUNGER, TOLLES & OLSON LLP
MALCOLM A. HEINICKE
REBECCA GOSE LYNCH

By: _____
MALCOLM A. HEINICKE

Attorneys for Defendants
BROADSPIRE SERVICES, INC. AND
PLATINUM EQUITY LLC

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: _____

The Honorable Martin J. Jenkins